

***Exhibit B***

Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
Meyer, Shaffer & Stepan, PLLP  
430 Ryman Street  
Missoula, MT 59802  
Tel: (406) 543-6929  
Fax: (406) 721-1799  
rob@mss-lawfirm.com  
ryan@mss-lawfirm.com  
james@mss-lawfirm.com

Matthew L. Merrill (appearing *pro hac vice*)  
Merrill Law, LLC  
1863 Wazee Street, #3A  
Denver, CO 80202  
Tel: (303) 947-4453  
matthew@merrillwaterlaw.com

*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA )  
MAPLEY, )

Plaintiffs, )

vs. )

WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC., )  
WATCH TOWER BIBLE AND TRACT )  
SOCIETY OF PENNSYLVANIA, and )  
BRUCE MAPLEY SR., )

Defendants, )

WATCHTOWER BIBLE AND TRACT )  
SOCIETY OF NEW YORK, INC., )  
Cross Claimant, )

BRUCE MAPLEY, SR., )  
Cross Defendant. )

Case No. CV-20-52-BLG-SPW

**DECLARATION OF  
RYAN R. SHAFFER**

I, Ryan R. Shaffer, an attorney duly admitted to practice law in this Court, declares that the following is true and correct:

1. I submit this Declaration in support of Plaintiffs' Opposition to Defendant WTPA's Motion to File Amended Answer to First Amended Complaint, Cross-Claim, and Demand for Jury Trial Pursuant to Fed. R. Civ. P. 15(a)(2).

2. Plaintiffs have not settled with or released former Defendant Bruce Mapley Sr. from liability.

3. On Thursday, December 1, 2022, Plaintiffs' counsel was informed that the Defendants intended to file Motions to Amend to assert settled party defenses.

4. After WTNY filed its Motion to Amend, and before WTPA filed its Motion to Amend, I notified all defense counsel that no Plaintiff has settled with or released Bruce Mapley, Sr. Email correspondence from Ryan Shaffer to all defense counsel (Dec. 5, 2022) (attached as **Exhibit 1**).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 7<sup>th</sup> day of December, 2022.

By: /s/ Ryan Shaffer  
Ryan R. Shaffer  
MEYER, SHAFFER & STEPANS PLLP  
*Attorneys for Plaintiffs*

***Exhibit 1***

Jessica Yuhas

---

**From:** Ryan Shaffer  
**Sent:** Monday, December 5, 2022 1:45 PM  
**To:** Brett Jensen; Christopher Sweeney; Jon Wilson; Rob Stepans; James Murnion  
**Cc:** Gerry Fagan; Jordan W. FitzGerald; Joel Taylor; Matthew Merrill; Katy Gannon  
**Subject:** RE: Mapley and Caekaert v. Watch Tower

Counsel,

No plaintiff has settled with or released Bruce Mapley Sr.

I wanted you to be aware of this in the event it impacts your pending, or soon to be pending Motions to Amend.

I understand you wanted to ask Ms. Mapley about whether a settlement or release was signed during her depo. My recollection is that I let her answer those questions and she said no, then when you began asking whether she had authorized her lawyers to dismiss Mapley, I objected based on A-C privilege.

Either way, there is no settlement or release with Mapley on behalf of any Plaintiff.

Best,

Ryan R. Shaffer



*Montana Office:*  
430 Ryman St.  
Missoula, MT 59802  
Tel: 406-543-6929  
Fax: 406-721-1799

*Wyoming Office:*  
3490 Clubhouse Drive, Suite 104  
Wilson, WY 83014  
Tel: 307-734-9544  
Fax: 307-733-3449

The information contained in this email is confidential and privileged. If you are not the intended recipient, please ignore and delete this message and inform the sender of the mistake. This email may be subject to the attorney-client privilege and attorney work product doctrine. If you are not the intended recipient, please ignore and delete this message and inform the sender of the mistake.